USDC-BALTIMORE '24 DEC 4 PM4:00



## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

\* CRIMINAL NO. MJM J4C 353

\* UNDER SEAL

## MOTION TO SEAL INDICTMENT

\*\*\*\*\*

The United States of America, by and through its undersigned attorneys, hereby moves this Honorable Court for an Order sealing the Indictment and arrest warrant in the above-captioned matter. In support of this motion, the government states as follows:

- 1. On December 4, 2024, the Grand Jury returned an Indictment charging the defendant with Conspiracy to Commit Money Laundering in violation of 18 U.S.C. § 1956(h).
- 2. The government requests that the Indictment and arrest warrant be sealed because the criminal investigation is ongoing, additional investigative steps are expected or underway, and the defendant is likely not aware of the existence or the scope of the investigation. Accordingly, premature disclosure of the criminal charges would create a significant likelihood that the defendant and any other co-conspirators will flee, dispose of or tamper with evidence, or intimidate or tamper with witnesses. Additionally, premature disclosure could endanger federal agents and compromise the ongoing federal investigation.

WHEREFORE, for the foregoing reasons, the government respectfully requests that the Indictment and arrest warrant, along with this Motion and the Court's reasons for sealing, if made express in the Order, be placed under seal until further order of this Court.

Respectfully submitted,

Erek L. Barron United States Attorney

Alexander Levin

Assistant United States Attorney

ORDERED as prayed this \_\_\_\_\_

day of December, 2024

The Hon. Charles D Austin United States Magistrate Judge